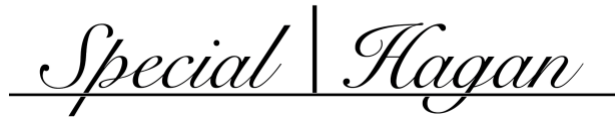


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Friday, May 6, 2022

VIA EMAIL and ECF

Honorable District Judge John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007-1312

Re: Kaye v. Health and Hospitals Corporation et. al.
18-CV-12137(JPC)(JLC)

Dear Honorable District Judge Cronan:

Plaintiff respectfully submits this letter to request that she be allowed to submit the complete filing of her opposition on Monday, May 9, 2022. Plaintiff makes this request so that Dr. Kaye will have the opportunity to review, and to execute her declaration in support of her opposition. Dr. Kaye lives in New Mexico, so we have been working around the time differences, our respective obligations and my health issues to work on her opposition. Accordingly, I apologize for any inconvenience this may cause the Court. However, we are attempting to present the opposition in an organized and succinct fashion, both in writing and on the docket.

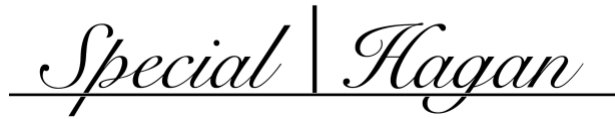
Consistent with the Court's Rules of Practice, I have reached out to Defense Counsel at 1:01PM yesterday. I am not sure if this was the case with Counsel in this case, but over the past week, I have experienced delays with my emails being received into the Law Department's system. Apparently, with my first name, a number of my emails have been directed to their spam box. However, at 11:43AM today, Counsel responded that they take no position regarding the request and said that we would have to take it up with the Court.

In closing, Plaintiff is very aware that the Court has already graciously granted her 9 weeks to oppose the motion herein. However, due to the size of the motion and Plaintiff's opposition, coordination across states and time zones, Plaintiff is once again seeking the Court's latitude so that her opposition is submitted in a professional and complete fashion consistent with the reverence that this Court and case both deserve.

Respectfully submitted,
/s/

Special Hagan, Esq.
Counsel for Plaintiff, Melissa Kaye, M.D.

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Cc: Donna Canfield, Esq.
Counsel for Defendants